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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ROYLENE RAY, KELLY CANNON,
KARLA HODGES and LAKETA
COULTER, individually and on behalf of
others similarly situated,

Plaintiffs,

vs.

BLUEHIPPO FUNDING, LLC,
BLUEHIPPO CAPITAL, LLC and
GATEWAY, INC.,

Defendants.

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BLUEHIPPO FUNDING, LLC and
BLUEHIPPO CAPITAL, LLC

Case No. C-06-1807 JSW EMC

**STIPULATION AND ~~PROPOSED~~
ORDER REGARDING
CONFIDENTIALITY OF SETTLEMENT
DISCUSSIONS IN CONNECTION WITH
CONTEMPLATED NOVEMBER 10, 2008
MEDIATION**

Hon. Jeffrey S. White
Courtroom 2, 17th Floor

Trial Date: December 14, 2009

All parties hereto, through their counsel of record, hereby stipulate and ask the Court to
order as follows:

1 1. The parties have scheduled a mediation for November 10, 2008 before the Hon.
2 Richard Hodge (Retired) of ADR Services, Inc.

3 2. In order to prepare for the November 10 mediation, the parties would like the
4 flexibility of having certain settlement discussions among themselves prior to the mediation date
5 without the concern that any such discussions would be excluded from the privileges and
6 confidentiality provisions associated with a mediation, including without limitation, California
7 Evidence Code § 1115 *et seq.*

8 3. The parties therefore stipulate that any and all discussions, whether orally or in
9 writing, concerning potential settlement of this matter prior to the date of the November 10
10 mediation shall be deemed to be protected by the same privileges and confidentiality provisions
11 as would apply had those discussions taken place during the course of an actual mediation.

12 SO STIPULATED.

13 Dated: October 7, 2008

BRAMSON, PLUTZIK, MAHLER &
BIRKHAUSER, LLP

14
15 By: _____/s/
Robert M. Bramson

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26 Attorneys for Plaintiffs
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28 KARLA HODGES and LAKETA COULTER

1 Dated: October 7, 2008

QUINN EMANUEL URQUHART OLIVER
& HEDGES

2
3 By: /s/
Jeffrey D. McFarland

4 Attorneys for Defendant
5 GATEWAY, INC.

6 Dated: October 7, 2008

FARELLA BRAUN & MARTEL LLP

7 I represent that concurrence in the filing of this
8 document has been obtained from each of the
9 other signatories which shall serve in lieu of
their signatures on this document.

By: /s/
C. Brandon Wisoff

10 Attorneys for Defendants
BLUEHIPPO FUNDING, LLC and
BLUEHIPPO CAPITAL, LLC

11 **ORDER**

12 Pursuant to the above-referenced stipulation, and for good cause shown, IT IS SO
13 ORDERED.

14 Dated: October 8, 2008, 2008

15
16 
17 Hon. Jeffrey S. White
United States District Judge